

EXHIBIT A

Clear Disciplinary History at USPTO

EXHIBIT A

7/17/23, 10:32 AM

TM Decisions - Administrative

An official website of the United States government [Here's how you know.](#)

Trademark Decisions and Proceedings

Search administrative orders and sanctions metadata/attributes and document text

Search

Filter by

Clear

Date range ⓘ

>

Party name(s) ⓘ

>

Weitao Chen

Apply

Document type ⓘ

>

Precedential/Non-Precedential ⓘ

>

Administrative Orders and Sanctions

PARTY NAME(S): WEITAO CHEN ✕

0 Results found

Page updated: Jul 17, 2023, 10:32:43 AM EST

+

Name ↑↓

Date ↓

Document type ↑↓

<< < > >> 25 ▾



UNITED STATES
PATENT AND TRADEMARK OFFICE

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[Freedom of Information Act](#)
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[StopFakes.gov](#)
[USA.gov](#)
[Department of Commerce](#)
[Strategy Targeting Organized Piracy](#)



7/17/23, 10:30 AM

USPTO FOIA Search Results: No results found.

Use the AND, OR and NOT fields to refine search results. Used together, these fields can refine your search results.

EXAMPLE:

The **AND** field generates results with all words entered, similar to a basic search. (AND: delicious).

The **OR** field generates results to include words separate from each other (OR: apples, oranges).

The **NOT** field will remove results matching specific terms (NOT: rotten). This combination of keywords will generate results for delicious apples or delicious oranges that are not rotten.

AND weitao and chen

[Return to basic search](#)

OR Include any of these words...

NOT Include none of these words...

 Refine

No results found for your search.

7/17/23, 10:30 AM

USPTO FOIA Search Results: No results found.



(<https://www.uspto.gov/>)

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ABOUT THIS SITE

USPTO BACKGROUND

FEDERAL GOVERNMENT

EXHIBIT B

Certificate of Good Standing and
Clear Disciplinary History of at New York Bar

EXHIBIT B



New York State Unified Court System

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Attorney Detail Report as of 07/21/2023

Registration Number: 5656079
Name: WEITAO CHEN
Business Name: FAAN LAW FIRM
Business Address: 60 CUTTERMILL RD STE 100C
GREAT NECK, NY 11021-3131
(Nassau County)
Business Phone: (718) 766-2567
Email: chen@faan.com
Date Admitted: 12/12/2018
**Appellate Division Department
of Admission:** 2nd
Law School: Yeshiva University Cardozo School of Law
Registration Status: Attorney - Currently Registered
Next Registration: Jan 2024



Disciplinary History

No record of public discipline



The Detail Report above contains information that has been provided by the attorney listed, with the exception of REGISTRATION STATUS, which is generated from the OCA database. Every effort is made to insure the information in the database is accurate and up-to-date.

The good standing of an attorney and/or any information regarding disciplinary actions must be confirmed with the appropriate Appellate Division Department. Information on how to contact the Appellate Divisions of the Supreme Court in New York is available at www.nycourts.gov/courts.

**Attorney Services**[Close](#)



*Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department*

I, Maria T. Fasulo, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that

Weitao Chen

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on December 12, 2018, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.



*In Witness Whereof, I have hereunto set
my hand in the City of Brooklyn on
April 13, 2023.*

Maria T. Fasulo

Clerk of the Court

EXHIBIT C

Amazon Rejection Email

EXHIBIT C

问题编号 12303347731

已解决的问题

查看您的问题日志

无法重新打开您的问题。如果您需要帮助，请 联系我们。

Amazon

三月 23, 2023 07:42 上午

Hello from Amazon Brand Registry,

We are writing to inform you that your enrollment request [Case ID: 12303347731] for Brand JWCMPIOA for BR Enrollment Application has been declined.

Why is this happening?

As a part of the enrollment process, a detailed investigation was conducted based on the (i) information available in our internal systems and (ii) information and documents provided by you. After carefully reviewing the information and documents, we have concluded that the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO’s Terms & Conditions.

What is the next step?

In order to move forward, you will need to file a new trademark with an attorney who has not been associated with any abusive/risky conduct in the past. You may reapply for Brand Registry with the new trademark by visiting <https://brandregistry.amazon.com/brand/enrollment>.

Regards,
Amazon Brand Registry

Thank you for selling with Amazon,

Ranjith G.
Amazon.com Seller Support

=====

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: <http://sellercentral.amazon.com/forums>
Browse all Seller Help topics: <http://sellercentral.amazon.com/gp/help>

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

<https://sellercentral.amazon.com/cu/case-dashboard/view-case?caseID=12303347731>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

^ 收起

EXHIBIT D

March 24 and 28 2023 Letters to Amazon

EXHIBIT D



Phone: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com

60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Website: www.faan.com

03/24/2023

Via Email

Amazon

trademarks@amazon.com

Re: Amazon's Inappropriate Policy Against Trademark Attorney

Dear Sir or Madam,

I have been a trademark attorney since 2018. I file trademark applications on behalf of my clients, and also take trademark applications transferred to me from other attorneys. In my practice, I always follow the USPTO's Terms & Conditions, and ethical and professional rules of an attorney. I have never been sanctioned by USPTO, and all applications filed by me have never been sanctioned or made invalid.

Recently, my clients' several enrollment requests for Brand Registry Enrollment Application has been declined. See attachments. According to emails from Amazon Brand Registry, "the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions."

Again, I have never been sanctioned by USPTO, and all applications filed by me have never been sanctioned or made invalid. I only take trademark applications transferred from other attorneys who are suspended by the USPTO. Those trademark applications left unrepresented are entitled to legal representation from qualified attorneys since those applications may be wrongly affected by the suspended attorneys. There are no rules prohibiting a qualified attorney to represent trademark applications left unrepresented.

If "being associated with a TM that was sanctioned" means representation of trademarks left unrepresented, Amazon's policy will deprive of an attorney's right of

practice law without any due process. I would like to communicate this issue to resolve it amicably, or clear up any misunderstanding. Your response are appreciated!

Sincerely,

/Weitao Chen/
Weitao Chen, Esq.

Email: chen@faan.com



Walter Chen <weitaochen123@gmail.com>

转发: [CASE 12216715851] Pxevpozh 的品牌注册请求

2 messages

hunan345154 <hunan345154@163.com>
To: "chen@faan.com" <chen@faan.com>

Wed, Mar 15, 2023 at 10:12 PM



hunan345154

hunan345154@163.com

---- 转发的原邮件 ----

发件人 [Amazon Seller Support<merch.service05@amazon.com>](mailto:merch.service05@amazon.com)
发送日期 2023年3月15日 09:28
收件人 [<hunan345154@163.com>](mailto:hunan345154@163.com)
主题 RE:[CASE 12216715851] Pxevpozh 的品牌注册请求

Hello from Amazon Brand Registry,

We understand your concern regarding enrolling in the Amazon Brand Registry program.

Thank you for applying for Amazon Brand Registry. We are very sorry that it took me so long to reply.

We are writing to inform you that your enrollment request [12216715851] for Brand PXEVPOZH for BR Enrollment Application has been declined.

As a part of the enrollment process, a detailed investigation was conducted based on the (i) information available in our internal systems and (ii) information and documents provided by you. After carefully reviewing the information and documents, we have concluded that the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions.

In order to move forward, you will need to file a new trademark with an attorney who has not been associated with any abusive/risky conduct in the past. You may reapply for Brand Registry with the

new trademark by visiting <https://brandregistry.amazon.com/brand/enrollment>.

欢迎向亚马逊提交反馈，从而帮助亚马逊改善您的开店体验。

您对我们提供的支持是否满意？

非 常 不 满 意	不 满 意	一 般	满 意	非 常 满 意
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如果您需要咨询新的问题，请在“联系卖家支持”页面创建新问题：<https://sellercentral.amazon.com/gp/contact-us/contact-amazon.html>

如果您对当前的问题（12216715851）还有其他疑问，请点击：https://sellercentral.amazon.com/gp/case-dashboard/view-case.html/ref=sc_cd_lobby_vc?caseID=12216715851

感谢您的合作与支持！

Thank you for selling with Amazon,

Patumrat P.

Amazon.com Seller Support

=====

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: <http://sellercentral.amazon.com/forums>

Browse all Seller Help topics: <http://sellercentral.amazon.com/gp/help>

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

<https://sellercentral.amazon.com/cu/case-dashboard/view-case?caseID=12216715851>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

Walter Chen <chen@faan.com>

Wed, Mar 15, 2023 at 10:36 PM

To: hunan345154 <hunan345154@163.com>, 玲珑跨境商标合作 <linglong20210511@163.com>, Yuko Wang <info@faan.com>

您好,

感谢您的反馈。请您用合适的渠道，或用这个选项“如果您对当前的问题（12216715851）还有其他疑问，请点击”答复亚马逊，把下面的解释发给亚马逊：

My current attorney never filed a trademark sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions. Only after the filing attorney was terminated or removed from representation, my current attorney appeared to represent the owners of those trademarks left unrepresented. There is no violation of USPTO rules for a new attorney to represent those trademarks left unrepresented. My current attorney has never been sanctioned for violating USPTO's Terms & Conditions.

后续亚马逊的回复，也可转发给我，以便进行处理和回应。谢谢！

Sincerely,

Walter (Weitao) Chen, Esq.

陈伟涛律师

3808 Union Street, Suite 11A

Flushing, NY 11354

Tel: (718) 766-2567

Fax: (718) 360-9695

Email: chen@faan.com

[Quoted text hidden]

问题编号 12303347731

已解决的问题

[查看您的问题日志](#)

无法重新打开您的问题。如果您需要帮助，请 [联系我们](#)。

Amazon

三月 23, 2023 07:42 上午

Hello from Amazon Brand Registry,

We are writing to inform you that your enrollment request [Case ID: 12303347731] for Brand JWCMPIOA for BR Enrollment Application has been declined.

Why is this happening?

As a part of the enrollment process, a detailed investigation was conducted based on the (i) information available in our internal systems and (ii) information and documents provided by you. After carefully reviewing the information and documents, we have concluded that the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions.

What is the next step?

In order to move forward, you will need to file a new trademark with an attorney who has not been associated with any abusive/risky conduct in the past. You may reapply for Brand Registry with the new trademark by visiting <https://brandregistry.amazon.com/brand/enrollment>.

Regards,
Amazon Brand Registry

Thank you for selling with Amazon,

Ranjith G.
Amazon.com Seller Support
=====

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: <http://sellercentral.amazon.com/forums>

Browse all Seller Help topics: <http://sellercentral.amazon.com/gp/help>

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<https://sellercentral.amazon.com/cu/case-dashboard/view-case?caseID=12303347731>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

[^ 收起](#)

FAAN LAW FIRM

Phone: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com

60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Website: www.faan.com

03/28/2023

Via Email
Amazon
trademarks@amazon.com

Re: Request to Stop Labeling Me With Abusive/Risky Conduct

Dear Sir or Madam,

I have been a trademark attorney since 2018. I file trademark applications on behalf of my clients. In my practice, I always follow the USPTO's Terms & Conditions, and ethical and professional rules of an attorney. I have never been sanctioned by USPTO, and all applications filed by me have never been sanctioned or made invalid.

Recently, my clients' several enrollment requests for Brand Registry Enrollment Application has been declined. See attachments. According to emails from Amazon Brand Registry, "the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions."

There are a few trademark applications transferred from other attorneys, and sanctioned/made invalid by USPTO. I have withdrawn representation for those TMs sanctioned/made invalid by USPTO. I am no longer being associated with those sanctioned TMs. Again, I have never been sanctioned by USPTO, and all applications filed by me have never been sanctioned or made invalid. As such, I respectfully request to stop labeling me with abusive/risky conduct. I appreciate your time and help on this matter. Thank you!

Sincerely,

/Weitao Chen/
Weitao Chen, Esq.

Email: chen@faan.com

问题编号 12303347731

已解决的问题

[查看您的问题日志](#)

无法重新打开您的问题。如果您需要帮助，请 [联系我们](#)。

Amazon

三月 23, 2023 07:42 上午

Hello from Amazon Brand Registry,

We are writing to inform you that your enrollment request [Case ID: 12303347731] for Brand JWCMPIOA for BR Enrollment Application has been declined.

Why is this happening?

As a part of the enrollment process, a detailed investigation was conducted based on the (i) information available in our internal systems and (ii) information and documents provided by you. After carefully reviewing the information and documents, we have concluded that the brand/user is currently ineligible for Brand Registry since the trademark (TM) registration was filed by an attorney who has previously being associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO's Terms & Conditions.

What is the next step?

In order to move forward, you will need to file a new trademark with an attorney who has not been associated with any abusive/risky conduct in the past. You may reapply for Brand Registry with the new trademark by visiting <https://brandregistry.amazon.com/brand/enrollment>.

Regards,
Amazon Brand Registry

Thank you for selling with Amazon,

Ranjith G.
Amazon.com Seller Support

=====

MORE WAYS TO GET HELP:

Visit our Seller Forums for help from other sellers: <http://sellercentral.amazon.com/forums>
Browse all Seller Help topics: <http://sellercentral.amazon.com/gp/help>

To contact us again about this issue, please use the Contact Us form in Seller Central using the following link:

<https://sellercentral.amazon.com/cu/case-dashboard/view-case?caseID=12303347731>

Please note: this e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message.

[^ 收起](#)

EXHIBIT E

Emails with Ms. Ambika Kumar

EXHIBIT E



Walter Chen <weitaochen123@gmail.com>

Amazon Brand Registry

15 messages

Kumar, Ambika <AmbikaKumar@dwt.com>
To: "chen@faan.com" <chen@faan.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>

Wed, Jun 21, 2023 at 6:52 PM

Walter,

We represent Amazon in connection with the allegedly defamatory emails concerning Amazon Brand Registry. We are looking into this and will get back to you, likely next week.

Ambika

Ambika Kumar ([pronunciation](#)) | Davis Wright Tremaine LLP
Partner | Co-Chair, Media Law Practice

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8030 | Mobile: (206) 356-0397
Email: ambikakumar@dwt.com | Website: www.dwt.com

Walter Chen <chen@faan.com>
To: "Kumar, Ambika" <AmbikaKumar@dwt.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>

Sat, Jul 1, 2023 at 11:21 AM

Dear Ms. Kumar,

I am following up on your last email before I move forward on your client's defamation against us. Thank you!

Sincerely,

Walter (Weitao) Chen, Esq.
60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Tel: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com
WeChat: chenweitaolvshi

[Quoted text hidden]

Kumar, Ambika <AmbikaKumar@dwt.com>
To: Walter Chen <chen@faan.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>

Sat, Jul 1, 2023 at 12:25 PM

Thanks. We plan to respond next week.

Ambika Kumar ([pronunciation](#)) | Davis Wright Tremaine LLP
Partner | Co-Chair, Media Law Practice

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8030 | Mobile: (206) 356-0397
Email: ambikakumar@dwt.com | Website: www.dwt.com

[Quoted text hidden]

Walter Chen <chen@faan.com>
To: "Kumar, Ambika" <AmbikaKumar@dwt.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>

Thu, Jul 6, 2023 at 10:07 AM

OK. Look forward to your response on or before 07/07/2023. Thank you!

Sincerely,

Walter (Weitao) Chen, Esq.
60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Tel: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com
WeChat: [chenweitaolvshi](#)

[Quoted text hidden]

Kumar, Ambika <AmbikaKumar@dwt.com>
To: Walter Chen <chen@faan.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>

Fri, Jul 7, 2023 at 5:43 PM

Walter: My apologies for the delay. We intend to respond next week. We think we can reach a resolution short of litigation, so would appreciate the extra time. Is there a time early next week when you could talk on the phone? Copying my associate, Sarah Burns, as I may not be available.

[Quoted text hidden]

Walter Chen <chen@faan.com>
To: "Kumar, Ambika" <AmbikaKumar@dwt.com>
Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>

Fri, Jul 7, 2023 at 6:33 PM

To resolve this issue short of litigation, I need the below letter to be executed. The issue is pretty simple and straightforward and I see no point for additional talk. Please advise on or before 07/10/2023.

Sincerely,

Walter (Weitao) Chen, Esq.
60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Tel: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com
WeChat: [chenweitaolvshi](#)

[Quoted text hidden]

 **Letter, Amazon.docx**
19K

Kumar, Ambika <AmbikaKumar@dwt.com>

Fri, Jul 7, 2023 at 6:35 PM

To: Walter Chen <chen@faan.com>

Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Cunningham, Tim" <TimCunningham@dwt.com>, "Burns, Sarah" <SarahBurns@dwt.com>

Thank you. However, that gives us the weekend, and I won't be in touch with my client then. Could you please give us until 7/12/14?

[Quoted text hidden]

Walter Chen <chen@faan.com>

Sat, Jul 8, 2023 at 9:12 AM

To: "Kumar, Ambika" <AmbikaKumar@dwt.com>

Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Cunningham, Tim" <TimCunningham@dwt.com>, "Burns, Sarah" <SarahBurns@dwt.com>

It has been a while. 07/11/2013 should be sufficient for a response.

Sincerely,

Walter (Weitao) Chen, Esq.

60 Cutter Mill Rd, Suite 100C

Great Neck, NY 11021

Tel: (718) 766-2567

Fax: (718) 360-9695

Email: chen@faan.com

WeChat: chenweitaolvshi

[Quoted text hidden]

Cunningham, Tim <TimCunningham@dwt.com>

Wed, Jul 12, 2023 at 1:13 AM

To: Walter Chen <chen@faan.com>, "Kumar, Ambika" <AmbikaKumar@dwt.com>

Cc: "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>

Mr. Chen,

I'm Amika's partner, and as I think she mentioned, she's travelling this week. Regrettably, I do not yet have a formal response from my client, but expect to provide you one tomorrow. Thank you for your understanding.

Tim Cunningham (he/him) | Davis Wright Tremaine LLP

1300 SW Fifth Avenue, Suite 2400 | Portland, OR 97201

Tel: (503) 778-5386 | Fax: (503) 778-5299

Email: timcunningham@dwt.com | Website: www.dwt.com

From: Walter Chen <chen@faan.com>

Sent: Saturday, July 8, 2023 6:12 AM

To: Kumar, Ambika <AmbikaKumar@dwt.com>

Cc: Merritt, Lisa <LisaMerritt@dwt.com>; Yuko Wang <info@faan.com>; Cunningham, Tim <TimCunningham@dwt.com>; Burns, Sarah <SarahBurns@dwt.com>

Subject: Re: Amazon Brand Registry

[EXTERNAL]

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

Walter Chen <chen@faan.com>

Wed, Jul 12, 2023 at 7:26 PM

To: "Cunningham, Tim" <TimCunningham@dwt.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>

Mr. Cunningham,

Please see the attached complaint filed. Please let me know if you are not the party to receive services on behalf of the defendant. Thank you!

Sincerely,

Walter (Weitao) Chen, Esq.
60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Tel: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com
WeChat: chenweitaolvshi

[Quoted text hidden]



01. Complaint filed.pdf
433K

Cunningham, Tim <TimCunningham@dwt.com>

Wed, Jul 12, 2023 at 7:40 PM

To: Walter Chen <chen@faan.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>, "Magliery, John" <JohnMagliery@dwt.com>

Thanks, Mr. Chen. Can you prepare a waiver of service form under FRCP 4(d)? I will discuss waiver with my client. Please also let me know if you intend on moving for preliminary relief.

Separately, I still anticipate obtaining a formal response from my client, and welcome ongoing discussions towards resolution.

Tim Cunningham (he/him) | Davis Wright Tremaine LLP

1300 SW Fifth Avenue, Suite 2400 | Portland, OR 97201

Tel: (503) 778-5386 | Fax: (503) 778-5299

Email: timcunningham@dwt.com | Website: www.dwt.com

From: Walter Chen <chen@faan.com>

Sent: Wednesday, July 12, 2023 4:26 PM

To: Cunningham, Tim <TimCunningham@dwt.com>

Cc: Kumar, Ambika <AmbikaKumar@dwt.com>; Merritt, Lisa <LisaMerritt@dwt.com>; Yuko Wang <info@faan.com>; Burns, Sarah <SarahBurns@dwt.com>

Subject: Re: Amazon Brand Registry

[EXTERNAL]

Mr. Cunningham,

[Quoted text hidden]

[Quoted text hidden]

Walter Chen <chen@faan.com>

Thu, Jul 13, 2023 at 11:35 AM

To: "Cunningham, Tim" <TimCunningham@dwt.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>, "Magliery, John" <JohnMagliery@dwt.com>

Hi Mr. Cunningham, please see attached waiver. Thank you!

Sincerely,

Walter (Weitao) Chen, Esq.

60 Cutter Mill Rd, Suite 100C

Great Neck, NY 11021

Tel: (718) 766-2567

Fax: (718) 360-9695

Email: chen@faan.com

WeChat: [chenweitaolvshi](#)

[Quoted text hidden]



230713 Waiver of Service, ao399 (1).pdf

248K

Cunningham, Tim <TimCunningham@dwt.com>

Fri, Jul 14, 2023 at 2:33 PM

To: Walter Chen <chen@faan.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>, "Magliery, John" <JohnMagliery@dwt.com>, "Kelly, Chelsea" <ChelseaKelly@dwt.com>

Mr. Chen,

I see that you filed an amended complaint. If you send a new waiver form, I can accept service of the amended complaint. Relatedly, I'm still wondering if you plan on filing a motion for a TRO. As you may or may not know, Judge Brown in the Eastern District of New York recently denied a TRO in a factually similar case, Zhu v. Amazon, Case No. 2:23-cv-05014. We will be providing you a copy of that order, along with a more fulsome letter addressing the allegations in your complaint, as soon as we can.

Thank you.

[Quoted text hidden]

Walter Chen <chen@faan.com>

Fri, Jul 14, 2023 at 3:01 PM

To: "Cunningham, Tim" <TimCunningham@dwt.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>, "Magliery, John" <JohnMagliery@dwt.com>, "Kelly, Chelsea" <ChelseaKelly@dwt.com>

Hi Mr. Cunningham, please see attached. Every case is different. I know the facts of my case. However, if Amazon has good-faith intent and action to resolve this by signing the letter without any further delay, let me know. Thank you!

Sincerely,

Walter (Weitao) Chen, Esq.
60 Cutter Mill Rd, Suite 100C
Great Neck, NY 11021
Tel: (718) 766-2567
Fax: (718) 360-9695
Email: chen@faan.com
WeChat: chenweitaolvshi

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2 attachments



230714 Waiver of Service.pdf
249K



04. Amended Complaint, filed (1).pdf
137K

Cunningham, Tim <TimCunningham@dwt.com>

Fri, Jul 21, 2023 at 3:12 PM

To: Walter Chen <chen@faan.com>

Cc: "Kumar, Ambika" <AmbikaKumar@dwt.com>, "Merritt, Lisa" <LisaMerritt@dwt.com>, Yuko Wang <info@faan.com>, "Burns, Sarah" <SarahBurns@dwt.com>, "Magliery, John" <JohnMagliery@dwt.com>, "Kelly, Chelsea" <ChelseaKelly@dwt.com>

Mr. Chen,

Please find the attached executed waiver of service.

[Quoted text hidden]



2023-07-14 Waiver of Service.pdf
260K

EXHIBIT F

Stipulation and Order for
Dismissal with Prejudice

EXHIBIT F

NIHAT DENIZ BAYRAMOGLU, ESQ.

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deniz@bayramoglu-legal.com

SHAWN A. MANGANO, ESQ.

Nevada Bar No. 6730

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BAYRAMOGLU OFFICES LLC

1540 West Warm Springs Road Suite 100

Henderson Nevada 89014

Telephone: 702.462.5973

Facsimile: 702.553.3404

Attorneys for Plaintiff Nazly Aileen Bayramoglu

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NAZLY AILEEN BAYRAMOGLU

Plaintiff,

vs.

AMAZON.COM, INC.

Defendant.

Case No.: 2:23-cv-00855-APG-NJK

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

Plaintiff NAZLY AILEEN BAYRAMOGLU (“Plaintiff”) and Defendant Amazon.com, Inc. (“Amazon”), by and through their attorneys of record, Shawn Mangano of the Bayramoglu Law Offices, LLC, and Rory Kay of McDonald Carano LLP, hereby stipulate and agree as follows:

1. On May 31, 2023, Ms. Bayramoglu, a trademark attorney, filed this lawsuit, alleging Amazon defamed her by sending emails to one or more of her clients or those of her firm stating that Amazon would not enroll them in Amazon’s Brand Registry because “the trademark [TM] registration was filed by an attorney who has previously been associated with a TM that was sanctioned/made invalid by the United States Patent and Trademark Office (USPTO) for violating USPTO’s Terms and Conditions” and “[i]n order to move forward, you will need to file a new

trademark with an attorney who has not been associated with any abusive/risky conduct in the past.”

2. Ms. Bayramoglu and Amazon have reached a settlement in this matter. Amazon has apologized for and will retract these emails, which were sent in error, and has stopped sending them. Amazon has no reason to believe that Ms. Bayramoglu has engaged in any professional misconduct before the USPTO. A copy of the apology letter is attached as Exhibit 1.

3. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Ms. Bayramoglu dismisses this lawsuit with prejudice, with each party to bear her or its attorneys’ fees and costs.

IT IS SO STIPULATED, this 15th day of June 2023.

BAYRAMOGLU OFFICES LLC

By: /s/ Shawn A. Mangano
NIHAT DENIZ BAYRAMOGLU, ESQ.
Nevada Bar No. 14030
SHAWN A. MANGANO, ESQ.
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rkay@mcdonaldcarano.com

Attorneys for Defendant Amazon, Inc.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: June 20, 2023

EXHIBIT 1

Benjamin U. Okeke
Senior Corporate Counsel